



Air Pollution Control Board
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COMPLIANCE ADVISORY

NOTICE OF AMENDMENTS TO RULE 67.12 - POLYESTER RESIN OPERATIONS

On April 6, 1993 the Air Pollution Control Board adopted amendments to Rule 67.12. Rule 67.12 is an existing rule that regulates Volatile Organic Compounds (VOC) and particulate emissions from polyester resin operations. Polyester resin operations are the mixing, pouring, hand lay-up, injection, forming, spraying and curing of polyester materials, excluding injection molding.

The following changes to the rule will affect polyester resin operations:

- Facilities will now have the option of keeping monthly usage records of polyester resin and cleaning materials. Daily records of polyester resin and associated cleanup materials will still be required for persons claiming to be exempt from the rule.
- Operations subject to Rule 67.12 will no longer be subject to Rule 66.
- Certain definitions were modified and others were added to promote a better understanding of the rule.
- The monomer content for pigmented gel coats is being limited to not more than 45% by weight, and for clear gel coats not more than 50% by weight, as applied.
- Cleaning materials with an initial boiling point greater than 190° C (374°F) may be used in addition to previously approved cleaning methods.
- Facilities using less than half a gallon per day of conventional (high-VOC) equipment cleaning materials will be exempt from the requirement for a solvent reclamation device. This exemption will be based on the average usage of cleaning materials per operating day calculated from the facility's monthly usage records.
- The recordkeeping requirements have been clarified. Facilities should maintain a current list of polyester resin materials and include the following information:
 - Manufacturer material specifications
 - Type (i.e., regular, vapor suppressed, corrosion-resistant, fire retardant) and monomer content of each resin
 - Type (i.e., pigmented or clear) and monomer content of each gel coat
 - VOC and monomer content of each catalyst, filler, diluent
 - For each vapor suppressed resin, the manufacturer's information on weight loss during polymerization
 - Product identification and VOC content of each cleaning material used in the polyester resin operations

- The compliance test methods have been clarified and updated.

Enclosed is a copy of Rule 67.12. Also enclosed are sample recordkeeping forms to assist you with the recordkeeping requirements. You are not required to use these forms but may choose to adapt these or similar forms to your individual needs.

The District will be reviewing permits for operations subject to Rule 67.12 and will notify you of any changes needed to update those permits. If you anticipate making physical modifications to your operations to comply with Rule 67.12, please contact the District to discuss if any permits will be required.

Should you have any questions regarding the changes to Rule 67.12, the enclosed sample forms or this advisory, please call the District's Enforcement Division at (619) 694-3340. If you need an application for an Authority to Construct/Permit to Operate or permit information, please call the District's Engineering Division at (619) 694-3307.

APCD
07/28/93